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UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

ARTHUR LEE ALFRED, II, et al.,

## Plaintiffs,

V.

WALT DISNEY PICTURES,,

**Defendant.**

Case No. 2:18-CV-08074-CBM-ASx

**DECLARATION OF BRANDON J. PAKKEBIER**

Judge: Hon. Alka Sagar  
*[referred by Hon. Consuelo B.  
Marshall for discovery]*  
Hearing Date: April 19, 2022  
Time: 10:00 AM  
Location: Courtroom 540

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2                   **DECLARATION OF BRANDON J. PAKKEBIER**

3                   I, Brandon J. Pakkebier, declare:

4                   1.       I am one of the attorneys representing Plaintiffs Arthur Lee Alfred II  
5 and Ezequiel Martinez, Jr. in this action. I have been admitted to practice before  
6 this Court *pro hac vice* for this matter. I am also admitted to practice before all  
7 courts in the State of Delaware and the State of Minnesota, as well as before the  
8 United States District Court for the District of Delaware and for the District of  
9 Minnesota. The facts stated herein are personally known to me and I could and  
10 would testify competently thereto if called upon as a witness under oath.

11                  2.       Attached as **Exhibit 1** is a true and correct copy of correspondence  
12 from Plaintiffs to Defendant Walt Disney Pictures (“Disney”) sent on February 25,  
13 2022, requesting a meet and confer pursuant to Local Rule 37-1.

14                  3.       Attached as **Exhibit 2** is a true and correct copy of correspondence  
15 Disney sent to Plaintiffs in reply on February 28, 2022.

16                  4.       Attached as **Exhibit 3** is a true and correct copy of the scheduling  
17 order governing this action, as required by Local Rule 37-2.1

18                  5.       Exhibit 4 is intentionally omitted.

19                  6.       Attached as **Exhibit 5** is a true and correct copy of a screenshot of the  
20 dictionary definition of “sequel” in the online *Oxford Learner’s Dictionary*.

21                  7.       Attached as **Exhibit 6** is a true and correct copy of an excerpted  
22 transcript of the oral argument before the Hon. Consuelo B. Marshall on October  
23 19, 2021 pertaining to Disney’s summary judgment motion.

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1 I declare under the penalty of perjury under the laws of the United States of  
2 America that the foregoing is true and correct.

3 Executed on the 15th of March 2022 in Minneapolis, Minnesota.

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5 /s/ Brandon J. Pakkebier

6 Brandon J. Pakkebier

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